Cheltenham Borough Council

Cabinet - 18 November 2025

Updated Safeguarding Policy

Accountable member:

Councillor Victoria Atherstone, Cabinet Member Safety and Communities

Accountable officer:

Claire Hughes, Director of Governance, Housing and Communities

Ward(s) affected:

All

Key Decision: Yes

Executive summary:

The Council's safeguarding policy which was last adopted in December 2023, has been reviewed and amended to take into account that the Council's Housing Services, which were formerly provided by Cheltenham Borough Homes, have now been brought back in-house.

The opportunity was also taken to update the policy in the light of best practice and to better reflect the strategic framework for safeguarding in Gloucestershire.

The safeguarding policy continues to cover both children and vulnerable adults as well as the Council's wider community safeguarding duties.

Recommendations: That Cabinet:

1.   **adopts the updated safeguarding policy;**

2.   **delegates authority to the Director of Governance, Housing and Communities, in consultation with the Cabinet Member Safety and Communities and One Legal, to amend the commissioning and**

procurement section of the safeguarding policy once the relevant Gloucestershire Safeguarding Children Partnership guidance and training becomes available.

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1.   Implications

1.1   Financial, Property and Asset implications

There are no direct financial, property or asset implications from the recommendations set out in the report.

Signed off by: Ela Jankowska – Finance Business Partner

Date: 01.10.2025

1.2 Legal implications

The relevant legal provisions are contained within the policy. The authority has various legal duties in respect of safeguarding and the policy seeks to provide guidance on how the authority will exercise those duties and functions.

Signed off by: One Legal, legalservices@onelegal.net.uk

Date:26.09.2025

1.3 Environmental and climate change implications

None arising directly a result of this report

Signed off by: Maizy McCann, Climate Officer, Maizy.mccann@cheltenham.gov.uk

Date:29.9.2025

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Quality homes, safe and strong communities
- Reducing inequalities, supporting better outcomes

1.5 Equality, Diversity and Inclusion Implications

The Council's safeguarding policy, and the training associated with it, follows good practice guidance from Gloucestershire Safeguarding Children Partnership and Gloucestershire Safeguarding Adult Board.   The training and associated guidance addresses issues including race, culture, disability, sexuality, gender, religion and age ensuring the Council applies the policy without prejudice or discrimination. By

its nature the policy supports the Council in its public sector equality duty by ensuring Council services are safe for all its communities.

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2   Background

2.1 Cheltenham Borough Council's staff and elected members have always held a strong commitment to safeguarding children, vulnerable adults, and the wider community. The Council's current safeguarding policy was adopted in December 2023 before housing services transitioned back into the Council. It was therefore necessary to amend the policy to ensure it supported safeguarding across the full range of Council services.

2.2 Since the safeguarding policy's adoption there have also been some developments in both strategy and practice in safeguarding. The updated policy takes these into account as outlined in this report.

3   Safeguarding policy amendments

3.1 The main structure of the policy is consistent with current best practice so has remained the same, however the following changes have been made.

3.2 Additional information has been added to the policy setting it in the current strategic framework of safeguarding in Gloucestershire. This includes descriptions of the roles of the Gloucestershire Safeguarding Children's Partnership (GSCP) and the Gloucestershire Safeguarding Adults Board (GSAB) as well as the overarching strategies Make Every Adult Matter and the Gloucestershire One Plan for children and young people.

3.3 The policy has been updated to include relevant housing personnel within the roles section, as well as the procedures and protocols. This not only creates one set of procedures for all council staff, it also provides additional resilience to the Council's safeguarding approach.

3.4 To ensure that there is effective governance over the implementation of the updated policy, and to ensure that there is consistency of practice across the organisation, the roles and responsibilities section has been amended to include the establishment of a Corporate Safeguarding Group. The group will consist of the key officers responsible for safeguarding, as well as representatives from across council services. This will allow discussion of concerns, dissemination of best practice and additional support for staff. The group will also contribute to the annual safeguarding self-assessment audits required of the Council.

3.5 The policy contains reference to specific Council service areas that, due to their nature or legislative framework, have specific safeguarding requirements.

Housing has now been added to this section and all relevant housing policies are expected to align to the safeguarding policy and cross reference the policy as appropriate.

3.6 Council service areas that use images of children and young people in promotional materials already seek parental consent to do so, however specific guidance on using images of children was not included in the previous iteration of the policy.

3.7 With an increased use of technology, including for enforcement purposes, there is a need for a corporate approach to the use of images in regard to safeguarding. The policy covers images taken with parental consent such as at events, as well as images taken where parental consent has not been obtained such as in the use of CCTV in community safety operations.

3.8 As part of the GSCP's review of its own procedures, all organisations were asked to strengthen their response to both making and receiving an escalation of a professional disagreement. Accordingly, the policy now includes specific reference to receiving an escalation in relation to Council services and outlines the staff that should be involved at each stage.

3.9 The commissioning and procurement section has remained the same, however the GSCP's Section 11 report has highlighted commissioning as an area of development across the partnership. The GSCP is therefore in the process of developing best practice guidance and training in this area. Once Council officers have reviewed the guidance and received the training, this section will be reviewed to ensure it is aligned to the guidance.

4 Reasons for recommendations

4.1 Although the current safeguarding policy was not due for review until the end of 2026, the integration of housing services into the Council has prompted the need for an earlier review. This ensures that all Council services are following the same standards of practice and procedures.

4.2 Although commissioning and procurement was raised by the GSCP as an area of development within the partnership, the Council's policy already contains sections related to these functions. Until the GSCP publishes further best practice guidance it does not seem prudent to review this section at this stage.

4.3 The guidance, once released, is likely to only result in minor changes, so will be dealt with under delegated authority.

5 Alternative Options considered

7.1 The alternative to the recommendations would be to continue to have two

separate but aligned policies for housing and non-housing services. This would create the possibility of residents receiving different safeguarding responses. It also does not maximise the opportunity of increasing resilience in the safeguarding response by having a single policy and does not capitalise on the expertise present across the Council.

6 Consultation

8.1 Consultation on the policies have taken place with the Council's Human Resources team, One Legal, the Council's prevent lead and officers within Housing. Best practice has also been discussed with representatives of other district councils via the GSCP and GSAB district subgroup. Their feedback has been incorporated in the relevant sections.

7 Risks

7.1 Safeguarding is a statutory duty of Cheltenham Borough Council. Failure to have a safeguarding policy that covers all Council services could mean inconsistencies of practice across Council departments. This would mean that the Council was not fulfilling its statutory duties effectively. If the policy is not fully implemented across the Council it could also put children, vulnerable adults and the wider community who use Council services at risk of harm.

Report author:

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Appendices:

i. Risk Assessment
ii. Equality Impact Assessment – Screening
iii. Safeguarding Policy

Background information:

N/A

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	If the Council fails to engage fully with the safeguarding agenda the Council may not meet its statutory duties.	Claire Hughes	4	2	8	Reduce	Adoption and roll out of updated safeguarding policy	Tracy Brown Amanda Wray	
	If service areas fail to engage with the safeguarding agenda fully there may be a failure to safeguard a child or vulnerable adult in our care	Claire Hughes	4	2	8	Reduce	Roll out of training to all staff and elected members, deputy designated officers identified and trained. Communications plan Establishment of a corporate safeguarding team	Tracy Brown Amanda Wray	
	If services commissioned by the council do not meet the safeguarding standards required, the council may not meet its statutory duties and a	Claire Hughes	4	2	8	Reduce	Adoption of the policy and training for relevant staff Continue to seek confirmation that commissioned	Tracy Brown Amanda Wray	

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	child or vulnerable adult may not be effectively safeguarded						services have safeguarding policies in place via the annual assurance certificate		

STAGE 1 – Equality Screening

1. Identify the policy, project, function or service change

a. Person responsible for this EqIA

Officer responsible: Amanda Wray	Service Area: Safeguarding
Title: CBC Housing Safeguarding and Equality Diversity and Inclusion manager	Date of assessment: 10/10/2025
Signature:	

b. Is this a policy, function, strategy, service change or project? Policy

If other, please specify:

c. Name of the policy, function, strategy, service change or project

CBC Safeguarding Policy

Is this new or existing?	**Already exists and is being reviewed**

Please specify reason for change or development of policy, function, strategy, service change or project

Policy has been reviewed as part of a wider service improvement and expansion and in line with the consumer standards requirement.

d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Purpose:	The purpose of the updated Safeguarding Policy is to set out a clear and consistent approach to safeguarding across all Council services. It ensures that employees, elected members, volunteers, contractors, and commissioned providers understand their responsibilities and act appropriately to protect those at risk.
Aims:	The aims of the updated Safeguarding Policy are as follows: Raise overall awareness of safeguarding, the signs of abuse and information on what to do if any form of abuse is identified or suspected. Protect children and vulnerable adults from harm while using services that the Council is responsible for (both directly provided and commissioned) by ensuring services have safe working practices in place. Promote early prevention, health, wellbeing, and human rights, enabling children and vulnerable adults to live safely and free from harm. To empower individuals and enable them to make decisions about their living environment and support needs while respecting their rights, dignity, and independence.

	Ensure that employees, casual workers, volunteers, and elected members associated with Cheltenham Borough Council can report any safeguarding concerns appropriately. Ensure employees, casual workers, volunteers, and elected members have effective training and support to allow them to safeguard children and vulnerable adults. Fulfil the council's statutory responsibilities and duty of care, including cooperation with relevant authorities and safeguarding partners. Support the council's broader commitment to reducing inequalities within the borough by ensuring that safeguarding is central to community and housing services.
Outcomes:	The outcomes of the updated safeguarding policy are as follows: • Council elected members, staff, volunteers understand their roles and responsibilities in safeguarding. • Council elected members, staff, volunteers know how to recognise signs of abuse and how to respond appropriately. • To ensure that individuals who come into contact with Council services are safe from abuse, neglect, and exploitation. • To promote a culture of vigilance and early intervention in relation to safeguarding.
Who benefits:	The updated policy will benefit the following: • Council elected members, staff, volunteers • Individuals who come into contact with Council services • Tenants of the Council • The wider community of Cheltenham

e. What are the expected impacts?

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.	**Yes**
Do you expect the impacts to be positive or negative?	**Positive**

Please provide an explanation for your answer:

The updated safeguarding policy will have the following impacts on people:
- Children, young people, and adults who are at risk are protected from abuse, neglect, exploitation, and harm.
- Increased awareness and training for elected members, staff, volunteers on safeguarding.
- Better coordination between council teams to support people with complex needs.
- Encourages a culture of vigilance and responsibility across all community services.
- Ensures consistent, joined-up responses to safeguarding concerns.
- Clarifies roles and responsibilities for staff, volunteers, and partners in relation to safeguarding.

If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

f. Identify next steps as appropriate	
Stage Two required	Yes
Owner of Stage Two assessment	Tracy Brown / Amanda Wray
Completion date for Stage Two assessment	21/10/25

STAGE 2 – Full Equality Impact Assessment

2. Engagement and consultation

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

a. Research and evidence
List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.
The Council has engaged with wide range of groups to help shape the updated safeguarding policy. Internal staff consultation • Housing Officers and Managers: To understand safeguarding concerns arising in tenancy management, homelessness, and supported housing. • Community Services Teams: To gather insights on vulnerable groups and safeguarding risks in public spaces and events. • Safeguarding Leads: To ensure alignment with statutory duties and best practice. Community Engagement • Public Surveys or Focus Groups: Targeting residents, especially those from vulnerable or underrepresented groups (e.g. older adults, disabled people, ethnic minorities). • Tenant Forums and Housing Associations: To gather feedback from social housing tenants and those with lived experience of safeguarding issues. • Youth Councils or Schools: To include the voices of children and young people in shaping safeguarding priorities. Partnership Consultation • Gloucestershire Safeguarding Children Partnership (GSCP) and Safeguarding Adults Board: To ensure consistency with county-wide safeguarding strategies. • Police, NHS, and Mental Health Services: To align with multi-agency safeguarding protocols. • Voluntary and Community Sector (VCS): Including domestic abuse charities, refugee support groups, and LGBTQ+ organisations. In addition, the council has reviewed data and evidence including: • Safeguarding referral data • Housing complaints and tenancy breaches

- Community safety reports

b. Consultation

Has any consultation been conducted?	**Yes**

Describe the consultation or engagement you have conducted or are intending to conduct.
Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.
If no consultation or engagement is planned, please explain why.

Consultation and Ongoing Engagement

In addition to formal consultations with internal teams and community stakeholders as set out above, ongoing engagement is maintained through participation in a range of multi-agency partnership boards. These include:
- Gloucestershire Safeguarding Adults Board (GSAB)
- Fire Safety Development Group
- Gloucestershire Safeguarding Children's Partnership Board
- LGBTQ+ Partnership Board
- Mental Health and Wellbeing Partnership Board
- Learning Disabilities Partnership Board

Regular attendance at these boards enables the council to stay up to date with emerging safeguarding policies, procedures, and best practices. More importantly, it provides a platform to hear and reflect on the lived experiences of individuals from diverse and marginalised communities.

This insight is vital in shaping how the council responds to the safeguarding needs of vulnerable groups across housing, community services, and wider council functions.

This collaborative approach ensures that the policy remains responsive, inclusive, and aligned with individual specific needs, particularly in areas such as tenancy support, homelessness prevention, mental health, and equality.

3. Assessment

a. Assessment of impacts

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
AGE	Older people (60+)	Positive and negative	• Protects vulnerable older adults from abuse, neglect, and exploitation. • Promotes age-appropriate safeguarding responses and services. • But risks of barriers to reporting concerns – such as sensory, dementia, lack of awareness of safeguarding issues.	• Ensure older adults who may may face barriers in accessing digital reporting have other options – such as tenancy management and Housing Support officer engagement. • Raise awareness in hubs and sheltered schemes by providing sessions that explore and advise around specific safeguarding issues for older people.
	Younger People (16-25)	Positive	• Protects children and young people from abuse, neglect, and exploitation. • Promotes age-appropriate safeguarding responses and services.	
	Children (0-16)	Positive	• Protects children and young people from abuse, neglect, and exploitation. • Promotes age-appropriate safeguarding responses and services.	
DISABILITY A definition of disability under the Equality Act 2010 is available here. *See also carer responsibilities under other considerations.*	Physical disability	Positive and negative	• Recognises vulnerability of people with physical disabilities. • Encourages accessible safeguarding procedures and communication methods. • Policy includes safeguarding for adults with care and support needs, which often includes those with physical or learning disabilities. • Recognition of discriminatory abuse and institutional abuse. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	Offer safeguarding reporting through: • Phone (including text relay services) • Email • Online forms (with screen reader compatibility) • In-person at council offices or community hubs • Ensure these are clearly advertised and easy to access.
	Sensory Impairment (sight, hearing)	Positive and negative	• Recognises vulnerability of people with sensory disabilities. • Encourages accessible safeguarding procedures and communication methods. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	• Make available accessible formats for reporting: Easy Read version, Braille, British Sign Language**.**

	Mental health	Positive and negative	• Recognises vulnerability of people with mental health disabilities. • Encourages accessible safeguarding procedures and communication methods. • Good partnership working with Mental Health services. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	Continue to strengthen relationships with Mental Health services and Health professionals.
	Learning Disability	Positive and negative	• Recognises vulnerability of people with learning disabilities. • Encourages accessible safeguarding procedures and communication methods. • Risk of underreporting due to communication barriers or lack of accessible reporting tools.	Engage with Community investment, CBC Employment and Life skills team and Building circles project to encourage reporting.
GENDER REASSIGNMENT		Neutral	• No foreseen differential impact on people who are changing genders	Having clear information and procedures in place regarding Hate Crime and Hate incidents, including guidance and support options.
MARRIAGE & CIVIL PARTNERSHIP	Women	Positive and negative	• Supports individuals experiencing domestic abuse within any legal partnership. • Providing different formats in which to report a safeguarding concern • But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	Bring an updated domestic abuse policy to Cabinet for approval
	Men	Positive and negative	• Supports individuals experiencing domestic abuse within any legal partnership. • Providing different formats in which to report a safeguarding concern • But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	Bring an updated domestic abuse policy to Cabinet for approval .
	Lesbians	Positive and negative	• Positive Impacts: • Supports individuals experiencing domestic abuse within any legal partnership.	Bring an updated domestic abuse policy to Cabinet for approval .

			• But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	
	Gay Men	Positive and negative	• Supports individuals experiencing domestic abuse within any legal partnership. • Providing different formats in which to report a safeguarding concern • But there is a risk that safeguarding risks in non-traditional or informal relationships are over-looked	Bring an updated domestic abuse policy to Cabinet for approval
PREGNANCY & MATERNITY	Women	Positive	• Safeguarding procedures include unborn children in child protection concerns. • Staff are advised to consider risks to pregnant individuals in domestic abuse disclosures.	Bring an updated domestic abuse policy to Cabinet for approval
RACE* Further information on the breakdown below each of these headings, is available here. For example Asian, includes Chinese, Pakistani and Indian etc	White	Positive and negative	• Recognition of discriminatory abuse including racism and culturally motivated harm (e.g., honour-based violence, FGM, forced marriage). • Requirement for partner organisations to align with CBC safeguarding standards. • But recognising language barriers or culturally sensitive safeguarding approaches. • Plus risk of under-reporting in communities with mistrust of statutory services.	• Engagement with tenants and tenant panels to understand lived experience. • Engagement with tenant voice and panels to understand the gaps in services. • Use analysis and data to explore and evidence barriers experienced by different ethnic groups. • Work with Customer complaints to address areas of concern.
	Mixed or multiple ethnic groups	Positive and negative	See above	See above
	Asian	Positive and negative	See above	See above
	African	Positive and negative	See above	See above
	Caribbean or Black	Positive and negative	See above	See above
		Choose an item.		
RELIGION & BELIEF* A list of religions used in the census is available here	See note	Positive	• Policy acknowledges abuse linked to cultural or religious practices (e.g., HBV, FGM, forced marriage).	

			• Discriminatory abuse includes faith-based harassment.	
SEX (GENDER)	Men	Positive	• Recognition of safeguarding risks faced by men (e.g., male victims of domestic abuse or sexual exploitation).	
	Women	Positive	• Strong focus on domestic abuse, coercive control, and sexual violence—issues disproportionately affecting women. • Recognition of gender-specific safeguarding risks (e.g., FGM, forced marriage.	
	Trans Men	Positive	• The policy's inclusive language and recognition of discriminatory abuse supports trans individuals.	
	Trans Women	Positive	• The policy's inclusive language and recognition of discriminatory abuse supports trans individuals.	
SEXUAL ORIENTATION	Heterosexual	Positive	• Safeguarding champions and elected members are expected to promote inclusive practice.	
	Lesbian	Positive	See above	
	Gay	Positive	See above	
	Bisexual/Pansexual	Positive	See above	
Other considerations				
Socio-economic factors (income, education, employment, community safety & social support)		Choose an item.		
Rurality i.e. access to services; transport; education; employment; broadband		Choose an item.		
Other (e.g. caring responsibilities)		Choose an item.		

* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available here

4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer
• Ensure older adults who may may face barriers in accessing digital reporting have other options – such as tenancy management and Housing Support officer engagement. • Raise awareness in hubs and sheltered schemes by providing sessions that explore and advise around specific safeguarding issues for older people	**March 2026**	**Amanda Wray**
Offer safeguarding reporting through: • Phone (including text relay services) • Email • Online forms (with screen reader compatibility) • In-person at council offices or community hubs • Ensure these are clearly advertised and easy to access. • Make available accessible formats for reporting: Easy Read version, Braille, British Sign Language.	**March 2026**	**Amanda Wray**
Bring an updated domestic abuse policy to Cabinet for approval	**Jan 2026**	**Tracy Brown**
• Engagement with tenants and tenant panels to understand lived experience. • Engagement with tenant voice and panels to understand the gaps in services. • Use analysis and data to explore and evidence barriers experienced by different ethnic groups. • Work with customer complaints to address areas of concern.	**March 2026**	**Amanda Wray**

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

6. Change log

Name	Date	Version	Change